

Exhibit C

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(SN)

This document relates to:
All Actions

DECLARATION OF SUMAYYA KHATIB

I, Sumayya Khatib, pursuant to 28 U.S.C. §1746, hereby declare under penalty of perjury the following:

1. I am an associate at the law firm of Lewis Baach Kaufmann Middlemiss PLLC (“LBKM”), which represents defendants Muslim World League, the International Islamic Relief Organization, Dr. Abdullah Naseef, Dr. Abdullah al-Obaid, Dr. Abdullah al-Turki and Dr. Adnan Basha in the above referenced multi-district litigation. I am admitted pro hac to practice in this Court in the above-captioned matter and submit this declaration in response to the Court’s August 30, 2021 Order (ECF No. 7082).

2. I attended the deposition of Musaed Al Jarrah via Zoom on June 17-18, 2021, but I did not obtain a copy of the rough transcript at the end of each day’s deposition, nor of the final transcript. In addition, I directed LBKM’s Technology Director, Neal Harrington, to run a comprehensive search of the archive of all LBKM inbound emails to determine whether anyone at LBKM may have inadvertently received the Al Jarrah transcript from Golkow Litigation Services, and he verified that no one at LBKM has received the transcript from Golkow Litigation Services.

3. I have never communicated with Michael Isikoff in any way, and I can confirm that I did not communicate with him or anyone acting on his behalf regarding the contents of the Al Jarrah deposition from June 1, 2021 to August 1, 2021. In addition, I am not aware of anyone

at LBKM, or anyone acting at the direction of LBKM, who has communicated with Isikoff, or anyone acting on Isikoff's behalf, regarding the contents of the Al Jarrah deposition from June 1, 2021 to August 1, 2021.

4. In response to the Court's Order, I directed LBKM's Technology Director, Neal Harrington, to run a comprehensive search of the archive of all LBKM inbound and outbound emails to determine whether any emails were sent to or received from misikoff@yahoo-inc.com or misikoff@oath.com and he verified that no emails were sent to or received from either email address from June 1, 2021 to August 1, 2021.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



SUMAYYA KHATIB
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Dated: September 27, 2021